

FILED

NOV 06 2017

Mark C. McCart, Clerk
U.S. DISTRICT COURT

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY TOWNSEND,

Defendant.

Case No. 17 CR 114 JED

INDICTMENT

[COUNTS 1 and 3: 18 U.S.C.

**§§ 2252(a)(2) and 2252(b)(1) – Receipt
of Child Pornography;**

COUNTS 2 and 4: 18 U.S.C.

§§ 2252(a)(4)(B) and 2252(b)(2) –

Access with Intent to View Child

Pornography; Forfeiture Allegation:

18 U.S.C. § 2253 – Child Pornography

Forfeiture]

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. §§ 2252(a)(2) and 2252(b)(1)]

On or about November 23, 2015, in the Northern District of Oklahoma, the defendant, **JEFFREY TOWNSEND**, knowingly received and attempted to receive visual depictions of minors engaging in sexually explicit conduct using any means and facilities of interstate and foreign commerce and which visual depictions had been mailed, shipped, and transported in and affecting interstate and foreign commerce. These depictions contained materials which had been so mailed and shipped and transported by any means, including by computer. The production of such depictions involved the use of minors engaging in sexually explicit conduct and the visual depictions were of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT TWO
[18 U.S.C. §§ 2252(a)(4)(B) and 2252(b)(2)]

On or about November 23, 2015, in the Northern District of Oklahoma, the defendant, **JEFFREY TOWNSEND**, knowingly accessed with intent to view visual depictions of minors engaging in sexually explicit conduct in one or more graphic video files. The production of the visual depictions involved the use of at least one prepubescent minor and a minor who had not attained 12 years of age engaging in sexually explicit conduct. The visual depictions had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and had been shipped and transported using means and facilities of interstate and foreign commerce, and were produced using materials which had been so mailed and shipped and transported by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

COUNT THREE
[18 U.S.C. §§ 2252(a)(2) and 2252(b)(1)]

On or about December 2, 2015, in the Northern District of Oklahoma, the defendant, **JEFFREY TOWNSEND**, knowingly received and attempted to receive visual depictions of minors engaging in sexually explicit conduct using any means and facilities of interstate and foreign commerce and which visual depictions had been mailed, shipped, and transported in and affecting interstate and foreign commerce. These depictions contained materials which had been so mailed and shipped and transported by any means, including by computer. The production of such depictions involved the use of minors engaging in sexually explicit conduct and the visual depictions were of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT FOUR
[18 U.S.C. §§ 2252(a)(4)(B) and 2252(b)(2)]

On or about December 2, 2015, in the Northern District of Oklahoma, the defendant, **JEFFREY TOWNSEND**, knowingly accessed with intent to view visual depictions of minors engaging in sexually explicit conduct in one or more graphic video files. The production of the visual depictions involved the use of at least one prepubescent minor and a minor who had not attained 12 years of age engaging in sexually explicit conduct. The visual depictions had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and had been shipped and transported using means and facilities of interstate and foreign commerce, and were produced using materials which had been so mailed and shipped and transported by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATION
[18 U.S.C. § 2253]

The allegations contained in Counts One through Four of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

Upon conviction of any of the child pornography offenses alleged in Counts One through Four of this Indictment, as part of his sentence, the defendant, **JEFFREY TOWNSEND**, shall forfeit to the United States any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, including, but not limited to the HP Touchsmart 320 PC computer, serial number 3CR2210CXR.

All pursuant to Title 18, United States Code, Section 2253.

R. TRENT SHORES
UNITED STATES ATTORNEY



JEFFREY A. GALLANT
Assistant United States Attorney

A TRUE BILL

/s/Grand Jury Foreperson

Grand Jury Foreperson